

June 24, 2010

**VIA ELECTRONIC FILING**

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Public Service Commission of South Carolina  
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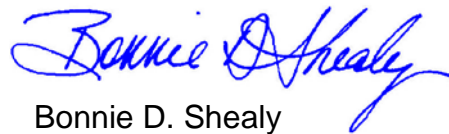
**Re: Global Connection Inc. of America - ETC Application  
Docket No. 2010-74-C**

Dear Jocelyn:

Enclosed for filing please find the testimony of Mark Ellis on behalf of Global Connection Inc. of America in the above referenced docket. By copy of this letter we are serving the same on the Office of Regulatory Staff. Should you have any questions, please contact me.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.

  
Bonnie D. Shealy

/bds  
Enclosure

cc/enc: C. Lessie Hammonds, ORS Staff Attorney (via email & U.S. Mail)  
Mr. Neil Savignano (via email)  
Mr. Carey Roesel (via email)

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

Application of Global Connection Inc.	)	Docket No. 2010-74-C
of America for Designation as an	)	
Eligible Telecommunications Carrier	)	

**DIRECT TESTIMONY OF MARK ELLIS  
ON BEHALF OF  
GLOBAL CONNECTION INC. OF AMERICA**

1    **Q.    PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.**

2    A.    My name is Mark Ellis. I am the Chief Executive Officer of Global Connection Inc. of  
3           America ("Global"). My business address is 5555 Oakbrook Parkway, Suite 620,  
4           Norcross, Georgia 30093.

5    **Q.    PLEASE    BRIEFLY    DESCRIBE    YOUR    BACKGROUND    AND**  
6           **QUALIFICATIONS.**

7    A.    I have a Bachelor of Science in Business Degree from the University of Minnesota and I  
8           have a Masters of Business Administration from Wharton, University of Pennsylvania. In  
9           my 32 year business career I have been the CEO or president of six different  
10          organizations, most of which were turnaround situations.

11   **Q.    PLEASE    DESCRIBE    YOUR    CURRENT    POSITION    AND    ITS**  
12          **RESPONSIBILITIES.**

13   A.    I am the Chief Executive of Global, responsible for all aspects of the company's  
14          operations and activities.

15   **Q.    WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

16   A.    The purpose of my testimony is to discuss Global's qualifications to be designated as an  
17          ETC by this Commission for the purposes of receiving federal universal service "Lifeline  
18          and Link-up" support, and why such designation will serve consumers and the public  
19          interest generally. I would like to incorporate by reference into this Testimony Global's  
20          application filed in this Docket.

1     **Q.     PLEASE DESCRIBE THE COMPANY**

2     A.     Global is a competitive local exchange carrier ("CLEC") authorized to provide facilities-  
3           based and resold local exchange access services in South Carolina pursuant to Order Nos.  
4           2000-580 and 2002-58. On June 22, 2010, Global Connection filed an application for  
5           authority to provide interexchange services in South Carolina.

6     **Q.     HAS THE COMPANY BEEN CERTIFIED AS AN ETC IN ANY OTHER STATE?**

7     A.     Yes, Global is currently designated as an ETC in North Carolina, Alabama, and Michigan  
8           where we presently service over 7,500 customers. Global has applications pending in  
9           Georgia, Tennessee, Mississippi, Florida, Arkansas, and Illinois. Global's ETC status is in  
10          good standing in all states where it has been granted.

11    **Q.     DOES THE COMPANY CURRENTLY PROVIDE SERVICE IN SOUTH**  
12          **CAROLINA?**

13    A.     Yes.

14    **Q.     DOES GLOBAL SATISFY THE FEDERAL CRITERIA FOR ETC**  
15          **DESIGNATION?**

16    A.     Yes, Global Connection is a common carrier for purposes of obtaining ETC designation  
17          under 47 U.S.C. Section 214(e)(1). Our network provides all of the following supported  
18          services which are required by 47 CFR Section 54.101(a): (1) voice-grade access to the  
19          public switched network; (2) local usage; (3) dual tone multi-frequency signaling or its  
20          functional equivalent; (4) single-party service or its functional equivalent; (5) access to  
21          emergency services; (6) access to operator services; (7) access to interexchange services;



(8) access to directory assistance; and (8) toll limitation for qualifying low-income consumers.

**Q. DOES GLOBAL SATISFY THE COMMISSION'S REQUIREMENTS FOR INITIAL DESIGNATION AS AN ETC PURSUANT TO 26 S.C. CODE REGS. 103-690?**

A. Yes.

**Q. FEDERAL AND STATE LAW REQUIRES A CARRIER TO OFFER ITS SERVICE THROUGHOUT A PROPOSED ETC SERVICE AREA IN RESPONSE TO ALL REASONABLE REQUESTS FOR SERVICE. HOW DOES THE COMPANY PROPOSE TO ACCOMPLISH THIS IN SOUTH CAROLINA?**

A. Global's commitment is to respond immediately to all reasonable requests for service and to offer its service throughout its proposed ETC service area as required by S.C. Code Regs. 103-690(C)(a)(1)(A). As described in our application, if Global's network already passes or covers the potential customer's premises, we will provide service immediately. For those instances where a request comes from a potential customer within our proposed ETC Designated Area but outside our existing network coverage, we will provide service within a reasonable period of time if service can be provided at a reasonable cost utilizing one or more of the following methods: (1) modifying or replacing the requesting customer's equipment; (2) deploying a roof-mounted antenna or other equipment; (3) adjusting network or customer facilities; or (4) reselling services from another carrier's facilities to provide service. If we determine that we cannot serve the customer using one

1 or more of these methods, then we will report the unfulfilled request to the Commission  
2 within 30 days after making such determination.

3 **Q. HOW LONG DO YOU EXPECT IT TO TAKE TO PROVISION SERVICE TO A**  
4 **CUSTOMER?**

5 A. Every situation is unique and must be handled on a case-by-case basis. In most cases  
6 consumers are provisioned in one to two business days.

7 **Q. WHAT FACTS SUPPORT A FINDING THAT THE COMPANY HAS THE**  
8 **CAPABILITY AND COMMITMENT TO OFFER AND ADVERTISE ITS**  
9 **SERVICES THROUGHOUT ITS PROPOSED ETC SERVICE AREA?**

10 A. Global has been providing high quality local service to low income customers since 1998.  
11 Global is currently one of the largest providers of prepaid home phone service in the  
12 United States. As mentioned above, Global is currently designated as an ETC in three  
13 states and provides Lifeline/Link-Up service to 7,500 customers in those states. Global's  
14 ETC status is in good standing in all states where granted.

15 **Q. IN THE APPLICATION, GLOBAL SUBMITTED AN ADVERTISING AND**  
16 **OUTREACH PLAN IN WHICH IT STATES THAT THE COMPANY WOULD**  
17 **CONTACT EXISTING CUSTOMERS TO DETERMINE ELIGIBILITY FOR**  
18 **PARTICIPATION IN THE LIFELINE PROGRAM. PLEASE DESCRIBE THE**  
19 **COMPANY'S PLANS.**

20 A. As required by 26 S.C. Code Regs. 103-690(C)(a)(1)(C) Global submitted a two year plan  
21 for advertising and outreach as part of its application. Global Connection will use  
22 USAC's Consumer Outreach Lifeline and Link Up letter as a billing insert to its existing

1 customer base. A copy is attached as **Exhibit 1**. Approximately 30 days after the billing  
2 insert has been sent, Global Connection will send a stand-alone notice of the same via  
3 U.S. mail to each active non-responding customers.

4 **Q. PLEASE DESCRIBE HOW THE COMPANY INTENDS TO ADVERTISE THE**  
5 **AVAILABILITY OF ITS LIFELINE AND LINK-UP SERVICES IN SOUTH**  
6 **CAROLINA.**

7 A. Global will not only advertise the availability of our services throughout our proposed  
8 service area, we plan to have a very heavy presence in low income areas, where we  
9 believe a large percentage of lifeline eligible customers are being underserved. Global  
10 Connection will advertise the general availability of and charges for the services to all  
11 telecommunications customers in the specified geographic area on a monthly basis. The  
12 Company intends to advertise using direct mail, television, the Internet, and through point  
13 of sale service centers located in major grocery store chains. Global Connection will post  
14 company-specific Lifeline and Link up information on its corporate website as well as on  
15 USACs Low Income consumer website. The webpage link is [www.realhomephone.com](http://www.realhomephone.com)  
16 or [www.connectwithglobal.com](http://www.connectwithglobal.com).

17 Global Connection will advertise using print media in free publications such as the  
18 Thrifty Nickel. These publications and others like them are available free and are widely  
19 distributed throughout the State of South Carolina. Ad rates are approximately \$2,400 per  
20 month. Global Connection advertises on broadcast TV stations in South Carolina with an  
21 estimated budget of \$4,000 - \$5,000 per month.

1 Global Connection has payment center agreements with multiple grocery chains including  
2 over 100 Bi-Lo and Kroger stores in South Carolina which provide point of sale collateral  
3 at customer service desks of each location. Our point of sale outreach provides direct  
4 customer contact as well as a safe and convenient payment channel to low income  
5 consumers. Point of sale collateral is “refreshed” regularly via an in store service vendor.  
6 Global Connection’s marketing plan operates direct mail campaigns in ETC certified  
7 states promoting lifeline service to eligible consumers. Campaigns use customer lists  
8 developed from our historical database or purchased mailing lists. Size, scope, and  
9 frequency of direct mail campaigns are dependent on a series of factors. Example of  
10 flyers used in other states are attached as **Exhibit 2**.

11 **Q. WHAT IS A REASONABLE TIME FOR THE COMPANY TO OFFER AND**  
12 **ADVERTISE THROUGHOUT ITS PROPOSED ETC SERVICE AREA?**

13 A. Global is committed to doing so immediately. Global will advertise as required and  
14 promptly respond to all requests for service.

15 **Q. HOW DOES GLOBAL VERIFY OR CERTIFY THAT A CUSTOMER IS**  
16 **ELIGIBLE TO PARTICIPATE IN THE LIFELINE PROGRAM?**

17 A. Global operates a 60 seat customer service call center in Norcross, Georgia and promotes  
18 activation of service through calls into the center. Lifeline programs require completion  
19 of a penalty of perjury document. Global Connection uses a printed application for  
20 service via direct mail programs. Any direct mail flyer used in SC will modify to conform  
21 to SC lifeline guidelines. Copies of a sample Lifeline script, perjury statement, and  
22 Michigan direct mail application are attached as **Exhibit 3**.

1   **Q.    HOW WILL THE COMPANY SATISFY 26 S.C. CODE REG. 103-690(C)(a)(2)’S**  
2       **REQUIREMENT THAT IT REMAIN FUNCTIONAL IN EMERGENCY**  
3       **SITUATIONS?**

4    A.   Global has the ability to remain functional in an emergency. We have a reasonable  
5       amount of back-up power and are able to reroute traffic around damaged facilities and  
6       manage traffic spikes resulting from emergency situations. Global delivers access to an  
7       interexchange, operator and directory assistance service on its own switch platform in  
8       Norcross, Georgia. Global facilities are collocated in a data center operated by Sago  
9       Networks. Global has disaster recovery network servers collocated in a data center  
10      operated by Sago Networks in Tampa, Florida. Each of these facilities provide; security,  
11      multiple layers of back-up power, climate control, fire suppression, 24/7/365 always-  
12      available personal support, and access to a highly scalable 10 Gigabit fiber optic transport  
13      solution from Atlanta to Miami to Tampa, with over fifteen additional POP’s throughout  
14      Georgia and Florida. Our network is monitored to check for proper operations at all time.  
15      We have technicians on call 24 hours per day.

16   **Q.    PLEASE DESCRIBE GLOBAL’S CONSUMER PROTECTION AND SERVICE**  
17       **QUALITY STANDARDS.**

18   A.   Global will satisfy appropriate consumer protection and service quality standards. We  
19      have existing customer care programs that demonstrate our commitment to quality  
20      service. As part of the requirements for providing local exchange services, Global  
21      Connection is required to abide by and satisfy all service quality and consumer protection  
22      rules under 26 S.C. Code Regs. 103-690(C)(a)(3), including filing of quality of service

1 reports with the Commission. In addition, we commit to satisfying all such applicable  
2 state and federal requirements related to consumer protection and service quality  
3 standards.

4 **Q. DOES GLOBAL CONNECTION OFER A LOCAL USAGE PLAN THAT IS**  
5 **COMPARABLE TO SERVICE PLANS OFFERED BY THE INCUMBENT**  
6 **CARRIERS PURUSANT TO S.C. CODE REGS. 103-690(C)(a)(4)?**

7 A. We provide our Lifeline customers with an additional \$3.50 credit so that federal  
8 matching monies can be maximized. This results in a Lifeline credit of \$13.50 per month  
9 which is consistent with the credit offered throughout the service areas of AT&T,  
10 Verizon, Embarq and Windstream.

11 **Q. DID GLOBAL FILE AN AFFIDAVIT WITH ITS APPLICATION IN REGARD**  
12 **TO CERTAIN CERTIFICATIONS REQUIRED BY THE COMMISSION'S**  
13 **REGULATIONS?**

14 A. Yes. My affidavit was attached to the application. In it I certified that Global  
15 acknowledges that the Federal Communications Commission may require the company to  
16 provide equal access to long distance carriers in the event no other ETC is providing  
17 equal access within the service area. I also certified that Global offers the services that are  
18 supported by the federal universal service support mechanisms by our own facilities or a  
19 combination of our facilities and the resale of another carriers services and that we will  
20 advertise in a media of general distribution the availability of such services including  
21 lifeline and the applicable charges.

1   **Q.    DOES THE COMPANY SERVICE PROMOTE AFFORDABLE TELEPHONE**  
2       **SERVICE?**

3    A.    Yes. Global continuously seeks ways to pass on added value and special promotions. Our  
4       goal is to provide low income customers with the most affordable telephone service while  
5       maintaining fiduciary responsibility to Global. We currently provide Lifeline service in  
6       South Carolina through resale of incumbent local exchange carriers' services. Global  
7       receives the lifeline credit via reduced pricing from the ILEC and passes the discount  
8       along to our customer. Global does not receive linkup reimbursement from the underlying  
9       carrier as promotional discounts eliminate the opportunity of Linkup credits. ETC  
10      certification will allow Global to market reduced pricing options to the consumer without  
11      dependence on the underlying carrier. Global can be more competitive in the market by  
12      establishing pricing plans independent of fluctuating carrier promotions.

13   **Q.    WILL LIFELINE ELIGIBLE CUSTOMERS BE ALLOWED TO CHOOSE TOLL**  
14       **BLOCKING SERVICE IN SOUTH CAROLINA?**

15   A.    Yes, pursuant to Section 54.101(a) of the FCC's rules, Global will provide toll limitation  
16      for Lifeline eligible customers.

17   **Q.    DO GLOBAL'S CUSTOMERS HAVE ACCESS TO COMPETITIVE**  
18       **DIRECTORY ASSISTANCE PROVIDERS?**

19   A.    Customers who have opted to receive toll limitation services do not have access to  
20      traditional directory assistance services. However, Global provides our TLS customers  
21      with access to free directory assistance service through the use of direct dial local access  
22      numbers. We actively promote use of free directory assistance services such as 1-800-

1 FREE-411 or 1-800-GOOG-411 by our customers via invoice notations and customer  
2 contact calls. Customers without TLS services have access to ILEC provided directory  
3 assistance at competitive rates as well as access to the free services we promote.

4 **Q. WILL THE COMPANY COMPLY WITH THE COMMISSION'S ORDERS**  
5 **REGARDING TO PROVISION OF INTEREXCHANGE AND LOCAL**  
6 **SERVICES?**

7 A. Yes. Global will, at all times, provide and market services in accordance with applicable  
8 Commission rules and orders. In addition, Global at all times will provide interstate  
9 services in compliance with all FCC rules and regulations.

10 **Q. WHAT LIFELINE AND LINK-UP DISCOUNTS WILL CONSUMERS RECEIVE**  
11 **IN SOUTH CAROLINA?**

12 A. For Link-up, Global will offer consumers 50% off our activation fee, up to a maximum  
13 \$30.00 discount. On Lifeline, Global will pass the required \$13.50 credit to all eligible  
14 customers on any service package offered to customers. The Company will provide an  
15 additional \$3.50 credit in addition to the Federal \$10.00 discount to maximize the federal  
16 match.

17 **Q. PLEASE DESCRIBE HOW THE COMPANY WILL PROVISION THE**  
18 **SERVICES FOR WHICH IT SEEKS ETC DESIGNATION.**

19 A. Global will continue to provide basic local exchange service on a pre-paid basis within  
20 the state of South Carolina. Global will provide local exchange services through resale  
21 and leased facilities (via commercial agreement with AT&T) in concert with its own soft  
22 switch. Global has commercial agreements in place with AT&T for the lease of



1 unbundled network elements and is certified to provide local exchange service as a  
2 facilities based carrier as well as through resale. Global Connection seeks ETC  
3 designation in our capacity as a facilities based carrier. For each of our customers, Global  
4 provides services as both a resale and as facilities based carrier. All customers are  
5 provided service functionality supported by federal universal service support mechanisms  
6 through a combination of owned facilities and resale of another carrier's service. Global  
7 provides services such as access to operator services, access to directory assistance,  
8 access to interexchange services, and access to directory assistance through owned and  
9 operated switching facilities. Global's switching facilities are collocated in a data center  
10 operated by Sago Networks. Global leases high capacity transport services from Sago  
11 Networks to support some of its local exchange services and all of its interexchange  
12 services.

13 Our interpretation of federal regulation 47 CFR 54.101 supports our assertion that several  
14 of the nine designated service functionalities (section A) supported by the FUSF  
15 mechanisms are provided for all customers via our owned facilities (section E) without  
16 regard to specific technology (section H) or whether facilities are located within the  
17 relevant service area (section G).

18 We provide a percentage of service functionalities to 100% of our customers through our  
19 owned facilities or via unbundled network elements. Through the provisioning methods  
20 outlined above, Global has the ability to offer all of the supported services outlined in  
21 Section 254(c) of the Telecommunications Act and CFR Section 54.101 (a).

1    **Q.    PLEASE DESCRIBE THE COMPANY'S PROPOSED ETC SERVICE AREA.**

2    A.    Global seeks to be designated as an ETC in all of the non-rural wire centers of AT&T,  
3           Verizon, Embarq, and Windstream in the State of South Carolina. Global does not  
4           request ETC designation in any rural area at this time.

5    **Q.    DOES THE COMPANY SEEK FEDERAL HIGH-COST FUNDS BY MEANS OF**  
6           **THIS APPLICATION?**

7    A.    No. Global is not requesting High-Cost support by means of this application for ETC  
8           designation. Global does not receive any High-Cost support in any of the states where  
9           Global is currently designated as an ETC. Global only receives Link-Up and Lifeline  
10          support.

11   **Q.    HAS GLOBAL EVER BEEN THE SUBJECT OF AN INVESTIGATION BY ANY**  
12          **STATE OR FEDERAL REGULATORY AGENCY OR COMMISSION?**

13   A.    Yes, In November 2009, the Public Utility Commission of Texas' oversight &  
14          enforcement division investigated Global Connection's provisioning of Lifeline service in  
15          Texas. Global Connection cooperated with the Commission and agreed with their  
16          findings that from June 2008 to September 2009 Global erroneously purchased  
17          approximately 789 consumer months of service from AT&T under lifeline pricing. The  
18          error was a result of our failure to timely apply for RETP certification in Texas. RETP  
19          certification is an additional certification required of resellers of lifeline service in Texas.  
20          The Texas Commission agreed that Global immediately took appropriate measures to  
21          correct the situation once we became aware of the error and settled the dispute via a small

1           restitution payment to the Texas USF. Attached as **Exhibit 4** are letters from Global  
2           Connection and the Texas Utility Commission closing the investigation.

3   **Q.   HOW WOULD THE PUBLIC INTEREST BE SERVED BY A GRANT OF ETC**  
4   **STATUS TO THE COMPANY?**

5   A.   With regard to the "public interest" test for ETC status, Global believes that it is in a  
6           unique position to serve the "public interest" when it comes to providing USF assistance.  
7           Global's agent distribution and payment center network is an integral part of its unique  
8           service as these agents operate in locations where low-income and credit impaired  
9           customers conduct business. These end-users often have nowhere to go for phone service  
10          as they have been disconnected by the incumbent LEC. These are the very people that the  
11          USF was meant to assist. It is Global's belief that if it is granted ETC status, it will be  
12          able to assist a large percentage of the very population that the fund was created to help.

13 **Q.   THE COMMISSION HAS ESTABLISHED ANNUAL REPORTING**  
14 **REQUIREMENTS FOR DESIGNATED ETCS. WILL THE COMPANY AGREE**  
15 **TO COMPLY WITH 26 SC CODE REGS. 103-690.1 WHICH OUTLINES THE**  
16 **REPORTING REQUIREMENTS?**

17 A.   Yes. We understand that we are to file the annual reporting information outlined below  
18          with the Commission and provide a copy to the Office of Regulatory Staff by June 30<sup>th</sup> of  
19          each year for the preceding calendar year.

20       (1)   a progress report on a two-year service quality improvement plan.

21       (2)   detailed information on any outage of at least thirty minutes for each service area  
22              as described in the regulation;

1       Should Global seek ETC designation for high cost support in another proceeding, we  
2       understand that we would be required to comply with these requirements listed as (1) and  
3       (2). Because we seek ETC designation solely for purposes of Lifeline and Link-Up  
4       support, it is our understanding that these are waived at this time pursuant to 26 SC Code  
5       Regs. 103-690.1(B)(b)(11). We understand that we would be required to file reports  
6       containing the information below:

7       (3)     the number of requests from potential customers within the service area that were  
8       unfilled and how it attempted to provide service;

9       (4)     the number of complaints or trouble reports per 1000 handsets or access lines;

10      (5)     certificate that it is complying with applicable service quality standards and  
11      consumer protection rules;

12      (6)     a detailed report and certification that Global is able to function in emergency  
13      situations;

14      (7)     a certification that Global is offering a local usage plan comparable to that  
15      offered by the incumbent LEC in the relevant service area;

16      (8)     certification that Global acknowledges that the FCC may require it to provide  
17      equal access to long distance carriers in the event that no other ETC is providing  
18      equal access within the service area;

19      (9)     the number of Lifeline customers and the number of customers that received Link  
20      Up assistance as of December 31<sup>st</sup>;

21      (10)    copies of responses to the Lifeline Verification Survey or Certification file with  
22      USAC on August 31<sup>st</sup> of each year.

1    **Q.     DOES THIS CONCLUDE YOUR TESTIMONY?**

2    **A.     Yes.**

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

Application of Global Connection Inc.	)	Docket No. 2010-74-C
of America for Designation as an	)	
Eligible Telecommunications Carrier	)	

**MARK ELLIS TESTIMONY**

**EXHIBIT 1**

**LIFELINE AND LINK UP LETTER**



**Lifeline, Link Up, and Toll Limitation Service support** provide discounts to eligible low-income consumers to help them establish and maintain telephone service. Lifeline can be used for the primary telephone line in a household.

**What type of discount is available?**

**Lifeline** assistance lowers the cost of basic, monthly local telephone service. Eligible consumers can receive up to \$13.50 per month in discounts.

**Link Up** reduces the cost of initiating new telephone service. Eligible consumers can receive a 50% discount off of the one-time costs associated with initiating telephone service, up to a maximum of \$30. Eligible consumers also qualify for a deferred payment schedule for remaining costs of up to \$200.

**Toll Limitation Service (TLS)** support allows eligible consumers who wish to avoid incurring large long distance fees to choose toll blocking or toll control at no cost.

**How do I know whether I am eligible?**

Eligibility for Lifeline, Link Up, and TLS support *varies by state*. Individuals who reside in states that have their own discount programs qualify for federal Lifeline, Link Up, and TLS support if they meet the eligibility criteria established by their state. In South Carolina, an individual is eligible if he or she participates in one of the following programs:

- Temporary Assistance to Needy Families (TANF)
- Food Stamps/Supplemental Nutrition Assistance Program (SNAP)
- Medicaid

Individuals that live on federally recognized Tribal Lands may qualify for Enhanced Lifeline/Link-Up discounts.

***How do I apply to receive Lifeline, Link Up, and TLS support discounts?***

To apply for Lifeline, Link Up, and TLS discounts please contact Global Connection at 877-511-3009.

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**MARK ELLIS TESTIMONY**

**EXHIBIT 2  
SAMPLE ADVERTISING MATERIALS**



# Do you need help paying for Home Phone Service?

## GLOBAL CONNECTION CAN HELP YOU!

### ✓ LifeLine

*This program provides a **discount** on the **monthly cost** of telephone service.*

### ✓ Link-Up

*This program provides a **discount** on the **installation cost** of telephone service.*

Do you or someone in your household participate in ANY of these programs?

- ✓ Medicaid
- ✓ Food Stamps
- ✓ Supplemental Security
- ✓ Income (SSI)
- ✓ Federal Public Housing Assistance (Section 8)
- ✓ Low-Income Home Energy Assistance Program (LIHEAP)
- ✓ Temporary Assistance to Needy Families (TANF)
- ✓ The National School Lunch Program's Free Lunch Program
- ✓ Low Income/No Income

RELIABLE  
AFFORDABLE  
CONVENIENT

SAVE  
UP TO  
**\$180**  
PER YEAR

Let Global Connection hook you up with  
**Government Subsidized Home Phone Service** today!

Qualified customers are entitled to discounted phone service. Now you can afford the safety and reliability of a real home phone. Call Global Connection today to start saving!

Hablamos Español **TO SEE IF YOU QUALIFY CALL TOLL-FREE:**  
**866-849-4989**

**GLOBAL**  
CONNECTION  
[www.ConnectWithGlobal.com](http://www.ConnectWithGlobal.com)



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Per Month

Activation Fee - **FREE**

## STANDARD - ADVANTAGE

**\$33.45<sup>+</sup>**  
Per Month

Activation Fee - **\$19.95\***

## PACKAGE INCLUDES:

- ✓ Caller ID Deluxe with Name
- ✓ Call Waiting Deluxe
- ✓ 100 US Long Distance Minutes

<sup>+</sup>PLUS Taxes, Fees and Surcharges – never more than \$15 per month.

**Toll Limitation Services can be provided  
at no charge for Lifeline customers.**

## Lifeline Eligibility Requirements:

**You may be eligible for discounted service  
if you receive any of the following:**

- Medicaid
- Supplemental Security Income (SSI)
- National School Lunch (free program only)
- Federal Public Housing Assistance / **Section 8**
- Temporary Assistance for Needy Families (TANF)
- Supplemental Nutrition Assistance Program (SNAP)
- Low Income Home Energy Assistance Program (LIHEAP)
- Household income at or below 135% of the Federal Poverty Guidelines

**CALL TO SEE IF YOU QUALIFY!**

**CALL TOLL FREE TO GET CONNECTED**

Hablamos  
Español

**1-877-283-3888**

[www.RealHomePhone.com](http://www.RealHomePhone.com)

**GLOBAL**  
CONNECTION

\*The Standard Package promotional discount provides \$41.05 off  
the customary \$60 Activation Fee. Limited time offer.

**K-MS-2010-Q2**

# FREE! FIRST MONTH●

of **Real Home Phone Service™**  
for qualified Lifeline customers



Plans from as low as  
**\$19.95\***  
Per Month

*The only service  
available at Kroger!*

- ✓ No Credit Check
- ✓ No Contract
- ✓ No Deposit

**IN ALL AT&T SERVICE AREAS**



Who are you going to trust  
for your home phone service?

For 10 years, Kroger has trusted  
Global Connection to provide their  
customers with affordable and  
reliable Real Home Phone Service.  
Getting service has never been easier

**GLOBAL**  
CONNECTION

**Hablamos Español**

**CALL TOLL-FREE AND  
GET CONNECTED:**

**1-866-998-9289**

[www.RealHomePhone.com](http://www.RealHomePhone.com)

\*Plus taxes fees and surcharges. Activation fee may apply. Must meet Lifeline eligibility requirements to qualify.

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

Application of Global Connection Inc.	)	Docket No. 2010-74-C
of America for Designation as an	)	
Eligible Telecommunications Carrier	)	

**MARK ELLIS TESTIMONY**

**EXHIBIT 3  
LIFELINE SCRIPT, PERJURY STATEMENT  
AND SAMPLE DIRECT MAIL APPLICATION**



In South Carolina, to be eligible to receive the Lifeline Assistance and/or Link-Up credit, you must certify that you are currently participating in one or more of the following programs.

- Temporary Assistance to Needy Families (TANF)
- Food Stamps
- Medicaid

Your Lifeline benefits will take effect when we receive a form signed under penalty of perjury that you receive benefits from one of the eligible programs. Lifeline can only be used for the primary telephone line in a household. The name on the telephone bill must match the name of the household member participating in the eligible program.

Additionally, Lifeline eligibility is reviewed periodically. Your benefits will be discontinued when you no longer meet the eligibility requirements or if proof of eligibility is not received within sixty (60) days. It is your responsibility to notify us if your eligible program participation ends.

## New or Existing Customer

Please be aware that if a South Carolina customer requests Lifeline, indicates that they may qualify for Lifeline or wants to transfer their current Lifeline services, you will be prompted to read the above script. The CSR will sell the \_\_\_\_\_ package. Once the customer has proven Lifeline eligibility, rep will change the customer's plan to Lifeline.

If you have any questions, please see your supervisor.

---

## Verification Customer<sup>1</sup>

Please be aware of the following steps to take if a South Carolina customer states that they have received notification that they will be removed from the Lifeline/Link-Up Program because they have failed to re-qualify. You will be prompted to read the above script and process the customer's information using the 'new customer' procedure. The CSR will sell the \_\_\_\_\_ package. Once the customer has proven Lifeline eligibility, A rep will change the customer's plan to Lifeline.

If you have any questions, please see your supervisor.

---

<sup>1</sup> Used Federal requirements  
3/30/10

## South Carolina Lifeline and Link-Up Program

NAME: \_\_\_\_\_  
(please print)

ADDRESS: \_\_\_\_\_  
\_\_\_\_\_

TELEPHONE NUMBER: \_\_\_\_\_

In order to receive the Lifeline/Link-Up discounts, you must certify that you receive benefits from one or more of the following programs.

**(Check all that apply)**

- ☐ Temporary Assistance to Needy Families (TANF)
- ☐ Food Stamps/Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid

I understand that my enrollment in the South Carolina Lifeline and Link-Up Program will not begin until I have signed and returned this application.

By signing this application, I certify, under penalty of perjury, that I participate in one or more of the above referenced programs. I also certify that I, nor any member of my household, currently receive a Lifeline discount from any other carrier (wireline or wireless) and that I, nor any member of my household, have received a Link-Up credit at the address listed above. I agree that I will contact Global Connection when I am no longer eligible to participate in the program or when my participation ends, whichever occurs sooner. This signed application gives Global Connection your authorization to access state and/or federal agency records to confirm your eligibility as indicated above.

Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Last 4 digits of SSN: \_\_\_\_\_

NOTE: If you do not certify your enrollment in one of the participating programs, you will **NOT** receive any Lifeline discounts and your telephone billing will remain at the current published rate. Also note that the name on the telephone service **MUST** match the name of the household member that is currently participating in one of the programs listed above. – This signed Application is valid for one year or whenever your participation in an eligible program ends, whichever occurs soonest.

# Real Home Phone Service™

Limited time **NO RISK OFFER!**

**LIFELINE CUSTOMERS  
GET YOUR FIRST**

**30 DAYS FREE!** in all  
AT&T  
service  
areas.

Then you pay only

**\$19.95\***  
Per Month

for **LIFELINE BASIC SERVICE**

As a Michigan resident, if you receive government assistance you may be eligible to receive discounted Lifeline home phone service. On March 18th, 2010, the Michigan Public Service Commission authorized GCIA to provide eligible Michigan households with discounted Real Home Phone Service™

For more information call: **1-866-763-3754**

For more information visit: **www.LifelineMI.com**



## Lifeline Phone Application In the State of Michigan

c/o GCIA  
P.O. Box 48269 Atlanta, GA 30362-1269

**No payment  
is required  
with this  
application**

Please complete  
all items on the form  
below, then Fax it with  
proof of assistance to:  
**1-888-870-9969**

**OR**

## MAIL FOR FREE

by completing the form below and sealing with business reply  
address panel on outside. Please seal your form with tape.

**NO STAMPS ARE NEEDED**

<b>SERVICE ADDRESS</b>	NAME: (Last) <input type="text"/> (First) <input type="text"/> (MI) <input type="text"/>
	Address: <input type="text"/> Apt: <input type="text"/>
	City: <input type="text"/> State: <input type="text"/> Zip Code: <input type="text"/> County: <input type="text"/>
	Existing Telephone Number: <input type="text"/> - <input type="text"/> - <input type="text"/> Alternate Telephone Number: <input type="text"/> - <input type="text"/> - <input type="text"/>

<b>BILLING ADDRESS</b>	NAME: (Last) <input type="text"/> (First) <input type="text"/> (MI) <input type="text"/>
	Address: <input type="text"/> Apt: <input type="text"/>
	City: <input type="text"/> State: <input type="text"/> Zip Code: <input type="text"/> County: <input type="text"/>

YOUR REQUEST IS FOR WHICH TELEPHONE SERVICE? CHECK THE ONE THAT APPLIES:

☐ New Service ☐ Transfer Existing Service from (Phone Company Name)

**NO DEPOSIT  
NO CREDIT CHECK  
NO CONTRACT**

\*PLUS Taxes, Fees and Surcharges – never more  
than \$15 per month. In all AT&T service areas.

### ☐ **LIFELINE BASIC SERVICE** INCLUDES:

- Unlimited Local Calling
- Emergency 911 Access

**\$19.95\*** Per Month

### ☐ **LIFELINE ADVANTAGE SERVICE** INCLUDES BASIC FEATURES PLUS:

- Caller ID • Call Waiting
- 100 Minutes Long Distance

**\$24.95\*** Per Month

### ☐ **LIFELINE PREMIUM SERVICE** INCLUDES ADVANTAGE FEATURES PLUS:

- Call Forwarding • Call Blocking
- 3 Way Calling • Speed Dial

**\$29.95\*** Per Month

Have you received a Lifeline credit in the past? ☐ Yes ☐ No If so when?

Have you received The Link-up credit in the past? ☐ Yes ☐ No If so when?

**Please indicate  
which Government  
assistance program  
you are currently  
enrolled:**

**If you're enrolled in one of these Government programs you could qualify for Lifeline pricing:**

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Medicaid                           | <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> National School Lunch (free program only)                                 |
| <input type="checkbox"/> Food Stamps (SNAP)                 | <input type="checkbox"/> Low-Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)                            |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)     | <input type="checkbox"/> Total household income at or below 150% of the Federal Poverty Guidelines |

**Don't qualify for Lifeline? Call us for our low standard pricing on Real Home Phone Service.**

I certify, under penalty of perjury, that I reside at the address I provided above and that I am a current recipient of the above program(s) and will notify GCIA when I am no longer participating in at least one of the above designated programs. I certify that I have not received a Link-Up credit at this address during the past twelve months before and that I will not seek a Lifeline credit on more than one phone line. I authorize GCIA or its duly appointed representative to access any records required to verify those statements to confirm my continued qualification for Lifeline and Link-Up discounts. I authorize GCIA to change my preferred carrier status to GCIA for all services for which I have contracted, including local, Intra LATA and/or long distance service, and designate GCIA to act as my agent for the preferred carrier change. I further request my current service provider to remove any preferred carrier freeze on my account. I understand that this preferred carrier change and any future preferred carrier change might involve a charge to me. A description of any and all terms, conditions, and charges that I will incur, including the rate, calling plan and other optional services is clearly set forth and has been made available to me within the Customer Service Agreement on the GCIA web site at [www.RealHomePhone.com](http://www.RealHomePhone.com), and I fully understand all charges that I am to be assessed. I consent to the release of my personal information as may be required for the administration of the Lifeline or Link-Up programs.

☐ I have attached proof of assistance Applicant's Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Applicant's date of birth: \_\_\_\_\_

Ethnic Background (Optional): This information is for statistical purposes only.

☐ African-American (Black) ☐ American-Indian ☐ Caucasian (White) ☐ Hispanic ☐ Other

**Do not write below this line:**

Lifeline: ☐ Approved ☐ Denied Link-up: ☐ Approved ☐ Denied GCIA Approval: \_\_\_\_\_ Date: \_\_\_\_\_



Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City/State: \_\_\_\_\_  
Zip: \_\_\_\_\_



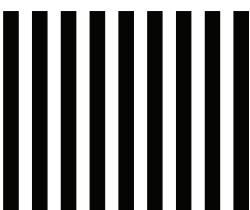
NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

**BUSINESS REPLY MAIL**

FIRST-CLASS MAIL PERMIT NO. 825 ATLANTA GA

POSTAGE WILL BE PAID BY ADDRESSEE

MICHIGAN LIFELINE PHONE APPLICATION  
c/o GCIA  
P O BOX 48269  
ATLANTA GA 30362-9848



**At last!**  
*Real* Home Phone Service™  
you can afford!

With no contract, deposit or credit check!

Only **\$19.95**\*  
Per Month

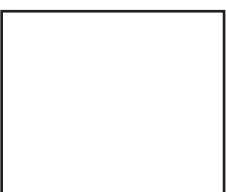
For more information call:  
**1-866-763-3754**

[www.LifelineMI.com](http://www.LifelineMI.com)



**Lifeline Phone Application  
In the State of Michigan**  
c/o GCIA  
P.O. Box 48269 Atlanta, GA 30362-1269

Time Sensitive Material  
Reply Required by  
Friday 4/30/2010



**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

Application of Global Connection Inc.	)	Docket No. 2010-74-C
of America for Designation as an	)	
Eligible Telecommunications Carrier	)	

**MARK ELLIS TESTIMONY**

**EXHIBIT 4**

**TEXAS UTILITY COMMISSION LETTER**



TX USF  
Department 1033  
P.O. Box 121033  
Dallas, TX 75312-1033

Re: USF CLEC#60682  
NECA TIN #22-3741663

Please accept the attached check #29571 in the amount of \$2,761.50 as a restitution payment to the Texas USF. As a result of notice from the Public Utility Commission of Texas and ensuing investigation #2009050001, Global Connection Inc of America became aware of errors in our provisioning of lifeline service in Texas prior to becoming RETP certified in September 2009.

Global Connection is in agreement with the commission that during the timeframe of June 2008 to September 3<sup>rd</sup>, 2009, Global erroneously purchased 789 consumer months of service from AT&T under Lifeline pricing. We voluntarily submit restitution to the Texas Universal Service Fund for these lines at \$3.50 per line, resulting in the total payment of \$2,761.50.

Global expressed to the commission that none of our business practices were meant to be unfair, misleading, deceptive, or anti-competitive as we were offering the same local telephone service that AT&T and other CLEC's provide with a lifeline discount to what we believed to be qualified lifeline customers. Global's error was in provisioning lifeline service in a resale capacity from AT&T, for which AT&T received the state benefit of \$3.50 from the PUC of Texas. The restitution payment is intended to reimburse the fund for this error.

It is my understanding that in accepting the restitution payment that the Public Utility Commission of Texas agrees that our actions were an oversight and did not represent a willful violation. As such, the commission has communicated that no administrative penalty will be applied as a result of their investigation.

If you have further questions regarding the payment, please contact me at 678-741-6246 or [nsavignano@globalconnectioninc.com](mailto:nsavignano@globalconnectioninc.com).

Sincerely,

A handwritten signature in cursive script, appearing to read "Neil Savignano".

Neil Savignano  
Controller  
Global Connection Inc of America

cc: Randy Klaus

**Barry T. Smitherman**  
Chairman

**Donna L. Nelson**  
Commissioner

**Kenneth W. Anderson, Jr.**  
Commissioner

**W. Lane Lanford**  
Executive Director



**Rick Perry**  
Governor

## *Public Utility Commission of Texas*

April 30, 2010

Mr. Mark D. Gagne  
Global Connection Inc. of America  
5555 Oakbrook Parkway  
Suite 620  
Norcross, GA 30093

**RE: Noncompliance with PURA § 55.015 and P.U.C. SUBST. R. 26.412(g)(2)  
relating to Lifeline Service Discounts**

**Investigation # 2009050001**

Dear Mr. Gagne:

By letter dated November 12, 2009, you were notified that Global Connection Inc. of America ("GCIA") was the subject of an investigation by the Oversight and Enforcement Division (O&E) of the Public Utility Commission of Texas regarding compliance with Public Utility Regulatory Act<sup>1</sup> (PURA) § 55.015 and P.U.C. SUBST. R. 26.412(g)(2) relating to Lifeline Service Discounts. This letter is to notify you that, having confirmed receipt of GCIA's restitution payment to the Texas Universal Service Fund, this investigation has been closed by O&E with no further action being recommended at this time.

Thank you for your assistance in bringing this investigation to a timely conclusion.

Sincerely,

A handwritten signature in dark ink, appearing to read "Marshall Adair", written over a horizontal line.

Marshall Adair  
Director-Oversight and Enforcement Division

<sup>1</sup> Public Utility Regulatory Act, TEX. UTIL. CODE. ANN. §§ 11.001-66.016 (Vernon 2007 & Supp. 2009)  
(PURA).



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BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2010-74-C

Application of Global Connection Inc. )  
of America for Designation as an )  
Eligible Telecommunications Carrier )  
Application of Global Connection Inc. )  
of America for Designation as an )  
Eligible Telecommunications Carrier )

**CERTIFICATE OF SERVICE**

This is to certify that I, Leslie L. Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **DIRECT TESTIMONY OF MARK ELLIS** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

C. Lessie Hammonds, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

Dated at Columbia, South Carolina this 24TH day of June, 2010.

  
\_\_\_\_\_  
Leslie L. Allen